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Atorneys for Plaintiffs DORA SOLARES
[Counsel for Defendants on signature page]

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DORA SOLARES,

Case No. 1:20-cv-00323-LHR-BAM

Plaintiff,

v.

RALPH DIAZ, in his individual capacity, KENNETH CLARK, in his individual capacity, JOSEPH BURNS, in his individual, and DOES 1 TO 15, in their individual capacities

**[PROPOSED] STIPULATED
AMENDED SCHEDULING AND
DOCKET CONTROL ORDER; AND
ORDER THEREON**

Hon. Lee H. Rosenthal

Defendants.

COME NOW Plaintiff Dora Solares and Defendants Burnes, Gallemore, Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva hereby

1 stipulate and submit the following proposed amended schedule to control the above-
2 listed matter:

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6 1. June 20, 2025

**COMPLETION OF NON-EXPERT
DISCOVERY**

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Written discovery requests are not timely if they are filed so close to this deadline that under the Federal Rules of Civil Procedure the response would not be due until after the deadline.

2. June 30, 2025

**EXPERTS ON MATTERS OTHER
THAN ATTORNEYS' FEES**

The plaintiff (or the party with the burden of proof on an issue) will designate expert witnesses in writing and provide the report required by Rule 26(a)(2) of the Federal Rules of Civil Procedure.

3. July 30, 2025

OPPOSING EXPERTS

The opposing party will designate expert witnesses in writing and provide the report required by Rule 26(a)(2) of the Federal Rules of Civil Procedure.

4. August 22, 2025

CLOSE OF EXPERT DISCOVERY

5. September 5, 2025

**PRETRIAL DISPOSITIVE
MOTIONS DEADLINE**

No motion may be filed after this date except for good cause.

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2 6. October 30, 2025

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JOINT PRETRIAL ORDER AND
MOTION IN LIMINE DEADLINE

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The Joint Pretrial Order will contain the
pretrial disclosures required by Rule
26(a)(3) of the Federal Rules of Civil
Procedure. Plaintiff is responsible for
timely filing the complete Joint Pretrial
Order. Failure to file a Joint Pretrial
Order timely may lead to dismissal or
other sanction in accordance with the
applicable rules.

11 7. November 14, 2025

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DOCKET CALL

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Docket Call will be held at 2:00 p.m. in
a location to be determined. No
documents filed within 7 days of the
Docket Call will be considered.
Pending motions may be ruled on at
docket call, and the case will be set for
trial as close to the docket call as
practicable.

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19 Any party wishing to make any discovery motions should arrange for a pre-
20 motion conference with the court before the preparation and submission of any
21 motion papers. That includes a motion to compel, to quash, or for protection. Email
22 Glenda Hassan at glenda_hassan@txs.uscourts.gov and Mrs. Eddins at
23 Lisa_Eddins@txs.uscourts.gov or fax her at 713-250-5213 to arrange for a pre-
24 motion conference. Notify your adversary of the date and time for the conference.
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1 Respectfully submitted,

2 Dated: March 31, 2025

3 LAW OFFICES OF ERIN DARLING

4 By: /s/Erin Darling

5 Erin Darling,

6 Attorneys for Plaintiff Dora Solares

7 Dated: March 31, 2025

8 Respectfully submitted,

9 ROB BONTA

10 Attorney General of California

JON S. ALLIN

11 Supervising Deputy Attorney General

12 */s/Jeremy Duggan (as authorized on
13 3/31/25)*

14 JEREMY DUGGAN

15 Deputy Attorney General

16 *Attorneys for Defendants*

17 *Burnes, Gallemore, Gamboa, Garcia,
18 Maytubby, Munoz, Loza, and Pena*

19 Dated: March 31, 2025

20 ANDRADA & ASSOCIATES

21 */s/ Lynne G. Stocker (as authorized
22 on 3/31/25)*

23 By: Lynne G. Stocker

24 *Attorneys for defendant SILVA*

25 IT IS SO ORDERED.

26 Dated: April _____. 2025

27 LEE H. ROSENTHAL
28 UNITED STATES DISTRICT JUDGE